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FRANCES MORADA

11 UNITED STATES OF AMERICA. CASE NO. S-03-376-DFL

15 FRANCES MORADA,
LILY MIZRAHE

16 Defendants.

CASE NO. S-03-376-DFL

**STIPULATION AND PROPOSED
ORDER REGARDING
CONTINUANCE OF STATUS
CONFERENCE**

Defendants.

17 Defendant Frances Morada, through her counsel of record, Malcolm Segal,
18 and Defendant Lily Mizrahe, through her counsel of record, Bruce Locke, and
19 Plaintiff United States of America, through its counsel, Assistant United States
20 Attorney Daniel S. Linhardt, agree and stipulate that the status conference set for
21 November 17, 2005 may be continued to January 19, 2006 at 10:00 AM, in order to
22 permit the parties to further investigate, review and discuss the case regarding future
23 proceedings, and to permit the defendants the opportunity to complete interviews
24 required in connection with a deferred prosecution agreement. This case continues
25 to be complex within the meaning of the Speedy Trial Act due to the volume of
26 discovery, complexity of the legal and factual issues, and the need of counsel to
27 conduct independent investigations.

1 Accordingly, the time between the scheduled court appearance on November
2 17, 2005 and the status conference on January 19, 2006 should continue to be
3 excluded from the calculation of time pursuant to the Speedy Trial Act, due to
4 complexity and counsels' need to prepare. 18 U.S.C. §3161 (h) (8) (B) (ii) and (iv)
5 [Local Codes T2/T4].

6
7 Dated: November 15, 2005

SEGAL & KIRBY

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10 By: /s/ Malcolm S. Segal
11 MALCOLM S. SEGAL
12 Counsel for Defendant Frances Morada

13 Dated: November 15, 2005

MOSS & LOCKE

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16 By: /s/ Bruce Locke
17 BRUCE LOCKE
18 Counsel for Defendant Lily Mizrahe

19 Dated: November 15, 2005

20
21 By: /s/ Daniel S. Linhardt
22 DANIEL S. LINHARDT
23 Assistant United States Attorney

24 **IT IS SO ORDERED.**

25 Dated: 11/21/ 2005

26
27 /s/ David F. Levi
28 HONORABLE DAVID F. LEVI
 Chief Judge, United States District Court